

### **REMARKS**

Claims 1, 5, 6, 8-10, 12-14, and 16-24 are pending in the present application ("Application"). By this Amendment and Response, claims 5 and 21 have been amended. The Applicant respectfully requests reconsideration of the Application in view of these amendments and the following remarks.

#### **I. 35 USC 112 REJECTIONS OF CLAIMS 5 AND 21**

As set forth in paragraph 8 of the Office Action, claims 5 and 21 stand rejected under 35 U.S.C. 112 as failing to comply with the written description requirement. The Examiner noted that claim 5 recites the limitation, "said database includes names of parties approved for receiving certain goods," that there does not appear to be support in the original specification for this limitation, and that it appears that the specification contains information on "restricted parties, i.e., the one that are not approved for receiving certain goods." (Office Action, p. 3). Claim 21 is dependent upon claim 5.

The Applicants have, by this current Amendment and Response, amended claim 5. Claim 5 as currently amended recites the method of claim 19, wherein said query includes a party's name and said database includes names of parties restricted from receiving certain goods. Applicants respectfully submit that this amendment obviates Examiner's 35 USC 112 rejections of claims 5 and 21 and renders claims 5 and 21 patentable. The Applicants therefore respectfully request that the rejection of claims 5 and 21 under 35 U.S.C. 112 be withdrawn.

**II. THE CLAIMS ARE PATENTABLE OVER  
THE CITED PRIOR ART COMBINATIONS**

**A. Paragraph 11 Rejections of Claims 1, 9, 10, 12-14, 16, 18, 19, 20, and 22**

Claims 1, 9, 10, 12-14, 16, 18, 19, 20, and 22 stand rejected under 35 U.S.C. 103(a) as being assertedly unpatentable over Bohm et al., U.S. Patent No. 5,404,507 (“Bohm”) in view of Havens, U.S. Patent Number 5,752,242 (“Havens”). The Applicants respectfully traverse these rejections.

**1. The Cited Combination Does Not Disclose the Features of Claim 1**

Claim 1 recites a method for comparing a query against data contained within a database comprising the steps of:

- (a) receiving said query;
- (b) extracting a plurality of attributes from a plurality of potential match areas from said query;
- (c) converting said plurality of attributes from said query, using at least one linguistic pattern matching analytical tool, into a plurality of linguistic pattern strings;
- (d) comparing, using at least one user selectable index property, said plurality of linguistic pattern strings with at least one stored linguistic pattern string from at least one stored attribute contained within said database for providing a set of matches;
- (e) analyzing said set of matches, using said at least one linguistic pattern matching analytical tool, to provide at least one set of matched attributes;
- (f) combining all of said at least one set of matched attributes to provide a combined result; and
- (g) wherein at least one of the actions of receiving, extracting, converting, comparing, analyzing, and combining is implemented using at least one data processing system.

The cited combination of Bohm in view of Havens does not teach, disclose or suggest the features of claim 1. The Examiner notes that Bohm does not teach the comparing step by, in part, using at least one user selectable index property. (Office Action, p. 5). Havens does not remedy such deficiency.

The Examiner cites to three sections of Havens in support of the assertion that Havens discloses the comparing step by using at least one user selectable index property. However, those sections do not disclose such feature. Two of the cited sections; col. 3, ll. 55-65; col. 9, l. 62 - col. 10, l. 20; disclose that a user may modify a filter (a set of one or more search parameters [e.g., Havens Abstract and col. 3, ll. 25-28]) by selecting search parameters. A comparison of the present Application with Havens clearly reflects that Havens' search parameters are not equivalent to the present Application's index properties, but rather are potential match areas -- which is a separate concept disclosed in the present Application.

In Havens, parameters specify potential match areas. For instance, Havens states:

User parameters 14 preferably include [emphasis added], without limitation: (a) an identifier or username; (b) a password; (c) a business role associated with the user that represents a business function of the user; (d) a vocation associated with the user that describes generally an area of expertise or responsibility of the user; (e) an industry associated with the user that describes generally an industry or other business community in which the user functions; (f) a business role of information that describes a particular purpose for which information retrieved by system 10 may be used; and any other characteristic suitable for association [emphasis added] with a user or the information needs of the user. Collectively, the business role associated with the user, vocation, industry, and business role of information may be referred to as attributes of the user [emphasis added]. User parameters 14 may specify a larger or smaller number of attributes that associate the user or the user's task to be performed with the desired information to be retrieved.

Thus, (a) - (b) above are potential match areas (identifier, password, business role, vocation, etc.), i.e., they are characteristics that are "*suitable* for association," while the specific information *actually* "associated" with the user is an attribute.

Fig. 2a of Havens reflects the nature of Havens attributes (as opposed to parameters):

**FIG. 2a**

USER PROFILES	100	108	110	112
	ID	P/W	ATTRIBUTES	...
	KEN	---	SENTRY; ANALYST; AIRLINES; AUDIT;	...
	ART	---	HISTORIAN; ENGINEER; MEDICAL; ---;	...
	LEE	---	GUARDIAN; MARKETER; ---; ---;	...
	...	...	...	...
			114	116
			118	120

As reflected in Fig. 2a, “sentry,” “analyst,” “airlines,” etc. -- being specific information that are *actually* associated with a user (rather than “vocation” which is a characteristic suitable for association, i.e., a parameter as used in Havens) are attributes, rather than parameters. Further, such construction is consistent with the ordinary meaning of “parameter.”

Thus, Havens’s disclosure that a user may select search parameters (col. 3, ll. 55-65) is a disclosure of user selectability of potential match areas, *not index properties*. Potential match areas and index properties are two distinct and exclusive concepts in the present Application; e.g.:

Potential Match areas	Index Properties
[0030] In step 205, the present invention extracts a set of attributes from the query information, one for each <b><u>potential match area, such as name, address, city, state, zip, etc.</u></b> ... [emphasis added]	[0107] In addition to the indexing techniques described above, the [name.indexTuning] section may also allow a user to customize certain <b><u>index properties</u></b> [emphasis added] by changing values in key/value pairs. <b><u>Examples</u></b> of such key/value pairs include: [emphasis added]
	[0108] metaphoneLength=#
	[0109] phonexLength=#
	[0110] soundexLength=#
	[0111] alphabeticNgramLength=#

	<p>[0112] consonantNgramLength=#</p> <p>[0113] fdiNgramLength=#</p> <p>[0114] fmlNgramLength=#</p> <p>[0115] numericNgramLength=#</p> <p>[0116] Such key/value pairs may set the number of characters used by each of index. In a preferred embodiment, values smaller than the default may result in more comprehensive indexing, but may also result in too many matches to be useful. Values larger than the default result in poorer indexing. The default values for the key/value pairs listed above are:</p> <p>[0117] metaphoneLength=4</p> <p>[0118] phonexLength=4</p> <p>[0119] soundexLength=4</p> <p>[0120] alphabeticNgramLength=3</p> <p>[0121] consonantNgramLength=3</p> <p>[0122] fdiNgramLength=3</p> <p>[0123] finlNgramLength=3</p> <p>[0124] numericNgramLength=3</p>
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That the Examiner is actually citing, for alleged support of disclosure of *user selectable index properties* (as that term is used in the present Application), Havens's disclosure of *potential match areas* -- is further reflected by the fact that the Examiner, in her rejection of claim 18 (Office Action, p. 5) cites the exact same sections for Haven disclosure of potential match areas. Again, as illustrated by example above and as reflected by the

entirety of the present Application -- the present Application's "potential match areas" and "user selectable index property" are distinct and exclusive terms.

The Examiner also cites to col. 6, ll. 25-57 of Havens as disclosing the comparing step using at least one user selectable index property. However, that section neither discloses the comparing step, nor doing so using a user selectable index property. The comparing step of claim 1, recites, "(d) comparing, using at least one user selectable index property, said plurality of linguistic pattern strings with at least one stored linguistic pattern string from at least one stored attribute contained within said database for providing a set of matches[.]"

The cited portion of Havens discloses wherein the system prompts the user for responses concerning the retrieved information. The system may then use the responses to modify the search parameters, Col. 6, l. 66 - col. 7, l. 24; i.e., the cited Havens section does *not* disclose comparing the plurality of linguistic pattern strings with at least one stored linguistic pattern string.

Further, col. 6, ll. 25-57 of Havens does not disclose the use of a user selectable index property. As noted above, Havens discloses that a user may provide responses to system prompts and that the system, specifically the modifier 48, may use those responses to modify search parameters -- not that the user may select index properties, as that term is disclosed in the present Application.

For at least the above reasons, the Applicants submit that claim 1 is patentable over Bohm in view of Havens. The Applicants therefore respectfully request that the rejection of claim 1 under 35 U.S.C. 103 be withdrawn.

## **2. Patentability of Claim 18**

Claim 18 is dependent, directly or indirectly, on claim 1. Because such claim has been shown above to be patentable, claim 18's dependency on claim 1 likewise renders claim 18 patentable. The Applicants therefore respectfully request that the rejection of claim 18 under 35 U.S.C. 103 be withdrawn.

### **3. The Cited Combination Does Not Disclose the Features of Claim 19**

Claim 19 recites the method of claim 18, wherein said at least one linguistic pattern matching analytical tool used for converting has characteristics at least some of which are user selectable.

The cited combination of Bohm in view of Havens does not teach, disclose or suggest the features of claim 19. The Havens sections cited by the Examiner as disclosing claim 19's feature that at least one linguistic pattern matching analytical tool used for converting has at least some user selectable characteristics are the same sections cited by the Examiner, with regard to claim 18 discussed above, as disclosing user selectable match areas (col. 3, ll. 55-65; col. 9, l. 62 - col. 10, l. 20; col. 6, ll. 25-57). However, it is clear from the present Application that user selectable linguistic pattern matching analytical tool characteristics is a distinct and exclusive concept from potential match areas. For instance, a potential match area may include name, address, city, state, zip, etc. (Application, ¶ 0029), while a user selectable linguistic pattern matching analytical tool characteristic for the converting step may be the number of characters to be used in an N-Gram search (Application, ¶¶ 0010, 0011).

As noted earlier above in the discussion pertaining to claim 1, the Havens sections cited by the Examiner disclose potential match areas. Havens does not disclose wherein at least one linguistic pattern matching analytical tool used for converting has at least some user selectable characteristics.

Additionally, claim 19 is dependent, directly or indirectly, on claims 18 and 1. Because such claims have been shown above to be patentable, claim 19's dependency on claims 18 and 1 likewise renders claim 19 patentable.

For at least the above reasons, the Applicants submit that claim 19 is patentable over Bohm in view of Havens. The Applicants therefore respectfully request that the rejection of claim 19 under 35 U.S.C. 103 be withdrawn.

#### **4. Patentability of Claim 20**

Claim 20 is dependent, directly or indirectly, on claims 19, 18, and 1. Because such claims have been shown above to be patentable, claim 20's dependency on claims 19, 18, and 1 likewise renders claim 20 patentable. The Applicants therefore respectfully request that the rejection of claim 20 under 35 U.S.C. 103 be withdrawn.

#### **5. The Cited Combination Does Not Disclose the Features of Claim 22**

Claim 22 recites the method of claim 19, further comprising the step of filtering said combined result according to at least one user selectable criteria. The cited combination of Bohm in view of Havens does not teach, disclose or suggest filtering the combined result according to at least one user selectable criteria.

The "combined result" is a combination of all sets of matched attributes (see step (f) of claim 1) following the receipt of a query, extraction of a plurality of attributes from a plurality of potential match areas from a query, conversion of the plurality of attributes (using at least one linguistic pattern matching analytical tool) into a plurality of linguistic pattern strings, comparison (using at least one user selectable index property) of the plurality of linguistic pattern strings with at least one stored linguistic pattern string from at least one stored attribute contained within said database for providing a set of matches, and analysis of said set of matches (using said at least one linguistic pattern matching analytical tool) to provide at least one set of matched attributes (see steps (a)-(e) of claim 1). Havens does not disclose such a combined result, much less disclose filtering such a combined result according to at least one user selectable criteria.

The Havens sections cited by the Examiner are the same sections cited in the Examiner's discussion of claims 1, 18, and 19 above. As noted earlier above in the discussion pertaining to claim 1, the Havens sections cited by the Examiner disclose potential match areas. Havens does not disclose filtering the combined result (as that term is disclosed in the present Application) according to at least one user selectable criteria.



Havens col. 3, ll. 55-65 and col. 6, ll. 25-57, cited by the Examiner, disclose the use of search parameters -- not the filtering of the combination of all sets of matched attributes provided from a set of matched linguistic pattern strings.

Likewise, Havens col. 9, l. 62 - col. 10 does not disclose such filtering. The cited Havens section basically provides:

Interactor (INT) 42 receives search results [i.e., matched linguistic pattern strings] ... and ... elicit[s] feedback from the user concerning the retrieved information. ... Modifier (MOD) 48 ... may modify some or all of the filter 20, custom filters 22, and filter templates 26 according to the information retrieved or the responses elicited from the user using interactor 42 and feedback prompts 44. ... For example, if modifier 48 receives a ranking of a search term below a threshold level according to a numeric scale or below the relevance of one or more other search parameters, modifier 48 might remove the low-ranking search parameter.

Col. 9, l. 62 - col. 10 does not disclose filtering a combination of all sets of matched attributes obtained from analysis of matched linguistic pattern strings. The section discloses modification of search parameters; not analysis of matched linguistic pattern strings, matching of attributes of matched linguistic pattern strings, combining all sets of matched attributes to provide a combined result, nor filtering such a combination of all sets of matched attributes obtained from analysis of matched linguistic pattern strings.

Further, Havens does not disclose any such filtering of such combined result according to at least one user selectable criteria. In fact, the cited section of Havens does not reflect *any action* taken according to user selectable criteria. As noted above, Havens elicits information (responses) from the user and based on that information *the Havens system, not the user*, modifies search parameters. Havens states, in part:

*“Modifier (MOD) [not the user] ... may modify [emphasis added] some or all of the filters 20, custom filters 22, and filter templates 26 according to the information retrieved or the responses elicited from the user using interactor 42 and feedback prompts 44. ... For example, if the volume of information retrieved using a filter 20 exceeds or falls below a certain level [emphasis added], modifier 48 may modify the collection of search terms for the filter 20 in order to decrease or increase, respectively, the volume of information that system 10 will thereafter retrieve for the same collection of user attributes. [Col. 6, l. 66 - col. 7., l. 11]*

...

For example, if modifier 48 receives a ranking of a search term below a threshold level according to a numeric scale or below the relevance of one or more other search parameters [emphasis added], modifier 48 might remove the low-ranking search parameter.

Thus, Havens discloses that it uses the information from the user's responses in order to modify the search parameter (not filtering) but that it is the system (modifier) that selects the criteria ("a certain level," "a threshold level according to a numeric scale," "the relevance of one or more other search parameters"). There is no disclosure in Havens that the user selects the criteria used for the modifications.

In short, there are numerous reasons, discussed above, why the cited combination does not disclose claim 22's feature of filtering the combined result according to at least one user selectable criteria.

Additionally, claim 22 is dependent, directly or indirectly, on claims 19, 18, and 1. Because such claims have been shown above to be patentable, claim 22's dependency on claims 19, 18, and 1 likewise renders claim 22 patentable.

For at least the above reasons, the Applicants submit that claim 22 is patentable over Bohm in view of Havens. The Applicants therefore respectfully request that the rejection of claim 22 under 35 U.S.C. 103 be withdrawn.

#### **6. The Cited Combination Does Not Disclose the Features of Claim 9**

The Examiner has rejected claim 9 with the same rationale as given for claim 19.

The Applicants incorporate their discussion presented above regarding claim 19 and state that for similar reasons claim 9 is allowable.

For at least the above reasons, the Applicants submit that claim 9 is patentable over Bohm in view of Havens. The Applicants therefore respectfully request that the rejection of claim 9 under 35 U.S.C. 103 be withdrawn.

#### **7. The Cited Combination Does Not Disclose the Features of Claim 10**

Claim 10 recites the system of claim 9, further comprising at least one filtering tool accessible to said central processing unit for filtering said combined result according to at least one user selectable criteria.

The cited combination of Bohm in view of Havens does not teach, disclose or suggest the features of claim 10. For example, the combination does not disclose at least one filtering tool accessible to said central processing unit for filtering said combined result according to at least one user selectable criteria. In support of the assertion that Havens discloses the features of claim 10, the Examiner cites to Havens at col. 3, ll. 55-65; col. 9, l. 62 - col. 10, l. 20; and col. 6, ll. 25-57. These sections have previously been addressed above with regards to claim 22, and the Applicants incorporate herein that discussion in that same is applicable to the rejection of claim 22. As noted in that discussion, the sections do not disclose such filtering; nor do they disclose the filtering tool claimed in claim 10.

Additionally, claim 10 is dependent, directly or indirectly, on claim 9. Because such claim has been shown above to be patentable, claim 10's dependency on claim 9 likewise renders claim 10 patentable.

For at least the above reasons, the Applicants submit that claim 10 is patentable over Bohm in view of Havens. The Applicants therefore respectfully request that the rejection of claim 10 under 35 U.S.C. 103 be withdrawn.

#### **8. Patentability of Claim 12**

Claim 12 is dependent, directly or indirectly, on claim 9. Because such claim has been shown above to be patentable, claim 12's dependency on claim 9 likewise renders claim 12 patentable. The Applicants therefore respectfully request that the rejection of claim 12 under 35 U.S.C. 103 be withdrawn.

**9. The Cited Combination Does Not Disclose the Features of Claim 13**

Claim 13 recites a computer program product for querying a database comprising a computer useable medium having a computer readable program code -executable on a computer system for performing the operations of:

- (a) receiving a query;
  - (b) extracting a plurality of attributes from a plurality of user selectable match areas from said query;
  - (c) providing at least one linguistic pattern analytical tool having characteristics at least some of which are user selectable for converting information of a plurality of attributes from said query into a plurality of linguistic pattern strings;
  - (d) comparing, with at least one user selectable index property, said plurality of linguistic pattern strings with at least one stored linguistic pattern string contained within said database to provide a set of matches;
  - (e) analyzing by at least one user selectable preference said set of matches to provide at least one set of matched attributes; and
  - (f) combining all of said at least one set of matched attributes to provide a combined result.
- [Emphasis added].

The Examiner's rejection of this claim states, "Claims 13, 14, and 16 are rejected with the same rationale given for claims 19, 10, and 12." However, claim 13 recites features that are not claimed in, nor analogous to, claims 19, 10, nor 12. While claims 19, 10, and/or 12 contain user selectability aspects for extracting, converting, and comparing -- claim 13 recites a separate step of "analyzing by at least one user selectable preference said set of matches to provide at least one set of matched attributes[.]" Accordingly, that feature is not addressed in the Examiner's rejections of claims 19, 10, and 12. The Examiner has not cited

to any specific place in Havens and/or Bohm where that feature, separate from the features of extracting, converting and comparing, is disclosed.

Additionally, the combination (i.e., a claimed invention encompassing all such features) of user selectability for extracting, converting, comparing, and analyzing are not disclosed, nor is any motivation indicated for same, within the cited combination.

Thus, the cited combination of Bohm in view of Havens does not teach, disclose or suggest the features of claim 13.

For at least the above reasons, the Applicants submit that claim 13 is patentable over Bohm in view of Havens. The Applicants therefore respectfully request that the rejection of claim 13 under 35 U.S.C. 103 be withdrawn.

**10. The Cited Combination Does Not Disclose the Features of Claim 14**

Claim 14 recites the computer program product of claim 13, further comprising computer readable code for filtering said combined result according to at least one user selectable criteria.

The Examiner's rejection of this claim states, "Claims 13, 14, and 16 are rejected with the same rationale given for claims 19, 10, and 12." (Office Action, p. 7)

The Applicants incorporate herein their discussion pertaining to claim 10 and assert that for similar reasons claim 14 is allowable.

Additionally, claim 14 is dependent, directly or indirectly, on claim 13. Because such claim has been shown above to be patentable, claim 14's dependency on claim 13 likewise renders claim 14 patentable.

For at least the above reasons, the Applicants submit that claim 14 is patentable over Bohm in view of Havens. The Applicants therefore respectfully request that the rejection of claim 14 under 35 U.S.C. 103 be withdrawn.

### **11. Patentability of Claim 16**

Claim 16 is dependent, directly or indirectly, on claim 13. Because such claim has been shown above to be patentable, claim 16's dependency on claim 13 likewise renders claim 16 patentable. The Applicants therefore respectfully request that the rejection of claim 16 under 35 U.S.C. 103 be withdrawn.

### **B. Paragraph 12 Rejections of Claims 5, 6 and 8**

Claims 5, 6 and 8 stand rejected under 35 U.S.C. 103(a) as being assertedly unpatentable over Bohm in view of Havens and further in view of Millard et al., U.S. Patent Publication Number 2002/0007335 ("Millard"). The Applicants respectfully traverse these rejections.

#### **1. The Cited Combination Does Not Disclose the Features of claim 5**

Claim 5, as currently amended, recites the method of claim 19, wherein said query includes a party's name; and said database includes names of parties restricted from receiving certain goods.

To establish a prima facie case of obviousness, a reason must be identified why a person of ordinary skill in the art would have combined the prior art elements in the manner claimed. May 3, 2007 USPTO Memorandum to Technology Center Directors regarding "Supreme Court decision on *KSR Int'l. Co., v. Teleflex, Inc.*" "It is never appropriate to rely solely on 'common knowledge' in the art without evidentiary support in the record, as the principal evidence upon which a rejection was based." MPEP § 2144.03 A. The record does not establish a motivation to combine as to the features of claim 5.

The Examiner has asserted that "[i]t would have been obvious at the time of applicant's invention to implement the method of Bohm and Havens using the approved buyers information taught by Millard in order to ensure that the customers of Bohm and Havens are approved to receive the products for which they are searching [emphasis added]." (Office Action, p. 7). However, Bohm and Havens merely disclose methods of searching,

and neither Bohm nor Havens teach, disclose nor suggest any method for authorization for, nor restriction of, receipt of goods by its users. Bohm and Havens pertain to searching information; neither pertain to determining whether its users may obtain items to which the information pertains; thus, there is no apparent motivation to combine with Millard's alleged feature.

Further reflecting that there is no motivation to combine Millard with Bohm and Havens as to the features of claim 5 for the reason asserted by the Examiner ("in order to ensure that the customers of Bohm and Havens are approved to receive the products") -- Millard in fact does not disclose a database of names of parties restricted from (nor approved for) receiving certain goods, much less disclose a search of such a database. Millard discloses a database that includes information pertaining to access to information (Millard, claim 27, element (a)(1), (2) ["access to postings"]) -- not pertaining to parties restricted from receiving certain goods. Thus, Millard's disclose of a database pertaining to access to information does not provide motivation, asserted by the Examiner, "to ensure that the customers of Bohm and Havens are approved to receive the products for which they are searching."

The cited combination of Bohm in view of Havens and further in view of Millard does not teach, disclose or suggest the features of claim 5. The combination does not disclose the features of claim 5, including a database that includes names of parties restricted from receiving certain goods.

Additionally, claim 5 is dependent, directly or indirectly, on claims 19, 18, and 1. Because such claims have been shown above to be patentable, claim 5's dependency on claims 19, 18, and 1 likewise renders claim 5 patentable.

For at least the above reasons, the Applicants submit that claim 5 is patentable over Bohm in view of Havens and further in view of Millard. The Applicants therefore respectfully request that the rejection of claim 5 under 35 U.S.C. 103 be withdrawn.

## **2. The Cited Combination Does Not Disclose the Features of Claim 6**

Claim 6 recites the method of claim 5, further including the step of filtering said combined result according to at least one user selectable criteria.

The cited combination of Bohm in view of Havens and further in view of Millard does not teach, disclose or suggest the step of filtering said combined result according to at least one user selectable criteria. The Havens sections cited by the Examiner as disclosing claim 6's feature of filtering said combined result according to at least one user selectable criteria are the same sections cited by the Examiner, with regard to claim 18 discussed above, as disclosing potential match areas (col. 3, ll. 55-65; col. 9, l. 62 - col. 10, l. 20; col. 6, ll. 25-57). However, it is clear from the present Application that filtering said combined result (as that term is used in the claim) is a distinct and exclusive concept from potential match areas and, in fact, those concepts come into play at different stages of the process; potential match areas are selectable before a search occurs, while filtering occurs after a search occurs.

Additionally, claim 6 is dependent, directly or indirectly, on claims 5, 19, 18, and 1. Because such claims have been shown above to be patentable, claim 6's dependency on claims 5, 19, 18, and 1 likewise renders claim 6 patentable.

For at least the above reasons, the Applicants submit that claim 6 is patentable over Bohm in view of Havens and further in view of Millard. The Applicants therefore respectfully request that the rejection of claim 6 under 35 U.S.C. 103 be withdrawn.

## **3. Patentability of Claim 8**

Claim 8 is dependent, directly or indirectly, on claims 6, 5, 19, 18, and 1. Because such claims have been shown above to be patentable, claim 8's dependency on claims 6, 5, 19, 18, and 1 likewise renders claim 8 patentable. The Applicants therefore respectfully request that the rejection of claim 8 under 35 U.S.C. 103 be withdrawn.



**C. Paragraph 13 Rejections of Claims 17 and 23**

Claims 17 and 23 stand rejected under 35 U.S.C. 103(a) as being assertedly unpatentable over Bohm in view of Havens, U.S. Patent Number 5,752,242 (“Havens”), further in view of Wheeler et al., U.S. Patent Number 6,618,727 (“Wheeler”), and further in view of Lambert, U.S. Patent Number 6,529,892 (“Lambert”). The Applicants respectfully traverse these rejections.

**1. Patentability of Claim 23**

Claim 23 is dependent, directly or indirectly, on claims 19, 18, and 1. Because such claims have been shown above to be patentable, claim 23’s dependency on claims 19, 18, and 1 likewise renders claim 23 patentable. The Applicants therefore respectfully request that the rejection of claim 23 under 35 U.S.C. 103 be withdrawn.

**2. The Cited Combination Does Not Disclose the Features of Claim 17**

Claim 17 recites a computer-implemented method for comparing a query against data contained within a database comprising the steps of:

- (a) receiving said query;
- (b) extracting a plurality of attributes from a plurality of user selectable match areas from said query;
- (c) converting said plurality of attributes, using a Metaphone based linguistic pattern analytical tool, into a plurality of Metaphone linguistic pattern strings;
- (d) comparing, using at least one user selectable index property, at least one of said plurality of Metaphone linguistic pattern strings with said at least one stored linguistic pattern string contained within said database to provide a plurality of Metaphone matches;
- (e) converting said plurality of attributes, using a Phonex based linguistic pattern analytical tool, into a plurality of Phonex linguistic pattern strings;

- (f) comparing, using at least one user selectable index property, at least one of said plurality of Phonex linguistic pattern strings with said at least one stored linguistic pattern string contained within said database to provide a plurality of Phonex matches;
- (g) converting said plurality of attributes, using a Soundex based linguistic pattern analytical tool, into a plurality of Soundex linguistic pattern strings;
- (h) comparing, using at least one user selectable index property, at least one of said plurality of Soundex linguistic pattern strings with said at least one stored linguistic pattern string contained within said database to provide a plurality of Soundex matches;
- (i) converting said plurality of attributes, using an N-gram based linguistic pattern analytical tool, into a plurality of N-gram linguistic pattern strings;
- (j) comparing, using at least one user selectable index property, at least one of said plurality of N-gram linguistic pattern strings with at least one stored linguistic pattern string contained within said database to provide a plurality of N-gram matches;
- (k) combining said plurality of Metaphone matches, said plurality of Phonex Matches, said plurality of Soundex matches, and said plurality of N-gram matches to form a set of combined matches;
- (l) analyzing said set of matches using said Metaphone based linguistic pattern analytical tool, Phonex based linguistic pattern analytical tool, said Soundex based linguistic pattern analytical tool, an edit-distance based linguistic pattern analytical tool, and a dictionaries based linguistic pattern analytical tool to provide at least one set of matched attributes;
- (m) combining said at least one set of matched attributes to provide a combined result; and
- (l) wherein at least one of the actions of (a) through (m) above is implemented using at least one data processing system.

The cited combination of Bohm in view of Havens, further in view of Wheeler, and further in view of Lambert does not teach, disclose or suggest the features of claim 17. For example, the combination does not disclose:

comparing, using at least one user selectable index property (emphasis added), at least one of said plurality of Metaphone linguistic pattern strings with said at least one stored linguistic pattern string contained within said database to provide a plurality of Metaphone matches;

comparing, using at least one user selectable index property (emphasis added), at least one of said plurality of Phonex linguistic pattern strings with said at least one stored linguistic pattern string contained within said database to provide a plurality of Phonex matches;

comparing, using at least one user selectable index property (emphasis added), at least one of said plurality of Soundex linguistic pattern strings with said at least one stored linguistic pattern string contained within said database to provide a plurality of Soundex matches; nor

comparing, using at least one user selectable index property (emphasis added), at least one of said plurality of N-gram linguistic pattern strings with at least one stored linguistic pattern string contained within said database to provide a plurality of N-gram matches.

As noted by the Examiner, Bohm does not teach a comparing step using at least one user selectable index property. (Office Action, p. 5). As discussed above with regards to claim 1, 18 and other claims, Havens teaches user selectable potential match areas but not comparing using user selectable index properties. Wheeler and Lambert also do not teach the above elements, and the Examiner has not asserted that they do.

Further, the cited combination does not teach claim 17's use of Metaphone, Phonex, Soundex, N-gram, edit-distance, and dictionaries based linguistic pattern analytical tools in a single process. The cited combination does not teach the combining of these tools in a single process.

For at least the above reasons, the Applicants submit that claim 17 is patentable over Bohm in view of Havens, further in view of Wheeler, and further in view of Lambert. The

Applicants therefore respectfully request that the rejection of claim 17, 23 under 35 U.S.C. 103 be withdrawn.

**D. Paragraph 14 Rejection of Claim 24**

Claim 24 stands rejected under 35 U.S.C. 103(a) as being assertedly unpatentable over Bohm in view of Havens, and further in view of Dey et al, U.S. Patent Number 6,757,866 ("Dey"). The Applicants respectfully traverse this rejection.

Claim 24 recites the method of claim 19, further comprising designating, responsive to a match candidate containing an unusual word in an unusual words dictionary, said match candidate to be a match.

The cited combination of Bohm in view of Havens further in view of Dey does not teach, disclose or suggest designating, responsive to a match candidate containing an unusual word in an unusual words dictionary, said match candidate to be a match. The combination does not disclose an unusual words dictionary, the use of an unusual words dictionary, nor the designation of a match based on a match candidate containing an unusual word in an unusual words dictionary.

The Examiner noted that Bohm and Havens do not teach designating, responsive to a match candidate containing an unusual word in an unusual words dictionary, said match candidate to be a match. The Examiner stated, "Dey teaches that words that are considered rare, i.e., unusual, being more indicative of a match than common words." However, Dey does not teach that "words that are considered rare, i.e., unusual" are more indicative of a match. Rather, Dey teaches that words that are "rare" in a collection, meaning occurring less often in the particular collection, may be more indicative of document utility. Dey reflects that labeling a word "rare" in Dey is a mathematical function of how often a term appears in a particular collection, not whether the term is considered rare by placement in an unusual words dictionary. (Dey, col. 15, ll. 31-53; col. 9, ll. 23 - 56). Dey discloses that, in a collection of osteoporosis documents, "women" may be considered a "rare" term. (Dey, col. 15, ll. 49 -52). Applicants note that, as a further example, in a collection of documents

concerning beef, the word “fish” might be a Dey “rare” word. Clearly Dey neither discloses the use of an unusual word dictionary, nor a function that is equivalent to an unusual word dictionary.

Further, Dey discloses that a “rare” word affects a ranking of a document -- rather than resulting in a designation of the document as a match. (Dey, col. 9, ll. 23-56; col. 9, l. 66 - col. 10, l. 4). In fact, the existence of a “rare” word in a document might not even cause the document to be returned to the user as a potential relevant document. *Id.*

Additionally, claim 24 is dependent, directly or indirectly, on claims 19, 18, and 1. Because such claims have been shown above to be patentable, claim 24’s dependency on claims 19, 18, and 1 likewise renders claim 24 patentable.

For at least the above reasons, the Applicants submit that claim 24 is patentable over Bohm in view of Havens further in view of Dey. The Applicants therefore respectfully request that the rejection of claim 24 under 35 U.S.C. 103 be withdrawn.

### **III. CLAIM OBJECTIONS**

Claim 21 stands objected to as being dependent upon a rejected base claim. (Office Action, p. 10). The Examiner has stated that the claim would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. However, the Examiner has also rejected claim 21 as failing to comply with the written description requirement because the claim recited a limitation pertaining to a database that includes names of parties approved for receiving certain goods, rather than parties not approved for receiving certain goods, which the Examiner indicated is supported by the Specification.

Applicants infer the Examiner finds claim 21 allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims and if the database reference therein was amended to pertain to parties restricted from receiving certain goods. Applicants have so amended claim 21 such that it now recites:

A method for comparing a query against data contained within a database comprising the steps of:

(a) receiving said query;

wherein said query includes a party's name;

(b) extracting a plurality of attributes from a plurality of potential match areas from said query;

wherein said plurality of potential match areas are user selectable;

(c) converting said plurality of attributes from said query, using at least one linguistic pattern matching analytical tool, into a plurality of linguistic pattern strings;

wherein said at least one linguistic pattern matching analytical tool used for converting has characteristics at least some of which are user selectable;

(d) comparing, using at least one user selectable index property, said plurality of linguistic pattern strings with at least one stored linguistic pattern string from at least one stored attribute contained within said database for providing a set of matches;

(e) analyzing said set of matches, using said at least one linguistic pattern matching analytical tool, to provide at least one set of matched attributes;

(f) combining all of said at least one set of matched attributes to provide a combined result;

(g) monitoring information about said party;

(h) monitoring information in said database;

(i) responsive to any change to said party's information, automatically rescreening said party for determining whether said party is approved for receiving certain goods; and

(j) responsive to any change to said database information, automatically rescreening said party for determining whether said party is approved for receiving certain goods;

wherein said database includes names of parties restricted from receiving certain goods;

wherein at least one of the actions of receiving, extracting, converting, comparing, analyzing, and combining is implemented using at least one data processing system.

Applicants respectfully submit that claim 21, as amended, is patentable. The Applicants therefore respectfully request that the rejections of claim 21 be withdrawn.

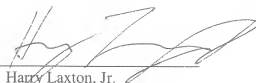
#### **IV. CONCLUSION**

For at least the reasons set forth above, the Applicants respectfully submit that claims 1, 5, 6, 8-10, 12-14, and 16-24 are in condition for allowance. The Applicants therefore respectfully request reconsideration of the rejections and objections. The Applicants respectfully request that the present application be allowed and passed to issue.

Should the Examiner believe anything further is desirable in order to place the application in even better condition for allowance, the Examiner is invited to contact the Applicants' undersigned representative.

Dated: July 20, 2007

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Harry Laxton, Jr.", is written over a horizontal line.

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